



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NEW ENGLAND REGION  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MA 02109-3912

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**MAR 14 2016**

Mr. Bill Fiske, President  
Printer's Oil Supply Co.  
310 Ballardville St.  
Wilmington, MA 018872

Re: **Notice of Noncompliance** Regarding the Emergency Planning and Community Right-to-Know Act (EPCRA) and the General Duty Clause (GDC) of the Clean Air Act (CAA) for Printer's Oil Supply Company (POSCO)

Dear Mr. Fiske:

On September 5, 2014, a representative of the United States Environmental Protection Agency (EPA) conducted an inspection of the POSCO facility in Wilmington, MA. The purpose of the inspection was to determine the facility's compliance with the Section 313 Toxic Release Inventory (TRI) provisions of EPCRA and the prevention of accidental release provisions under Section 112(r) of the CAA. EPA apologizes for not providing this notice of non-compliance earlier, but resource constraints inhibit the speed with which matters can be addressed.

**Section 313 of EPCRA**

Based on information obtained during the inspection and information provided after the inspection, EPA identified a violation of the requirements of Section 313 of EPCRA. The goal of Section 313 of EPCRA is to provide the public accurate information about the releases of toxic chemicals in their community. POSCO did not have all supporting material and documentation, including calculations used in developing each required TRI Form R or A at the facility during the inspection, as required by 40 CFR 372.10(c). EPA recognizes that POSCO and its consultant were able to provide this information seven days after the inspection.

**General Duty Clause**

During the inspection, EPA also identified a violation of Section 112(r)(1) of the CAA. The goal of Section 112(r) of the CAA is to reduce the risk of chemical accidents. Pursuant to the GDC, owners and operators of stationary sources that produce, process, handle, or store extremely hazardous substances must (a) identify hazards which may result from accidental releases of such substances using appropriate hazard assessment techniques; (b) design and maintain a safe



facility taking such steps as are necessary to prevent releases; and (c) minimize the consequences of accidental releases that do occur. To satisfy these mandates, it is necessary to meet with industry practices. In accordance with industry standards (American National Standards Institute/American Society of Mechanical Engineers (ANSI/ASME) A13.1 – 2007, *Scheme for the Identification of Piping Systems*), POSCO should have labeled all piping, including exterior piping, for all extremely hazardous (flammable) substances. At the time of the inspection, POSCO has not labeled exterior toluene and xylene piping in the underground storage tank area.

**Within 45 days** of receipt of this letter, please submit a description of actions taken to address the General Duty Clause violation listed above with supporting documentation of the actions POSCO will take so Section 313 of EPCRA and the General Duty Clause violations do not occur in the future to:

Chris Rascher  
RCRA, EPCRA and Federal Programs Unit  
U.S. Environmental Protection Agency  
5 Post Office Square – Suite 100  
Mail Code: OES05-1  
Boston, MA 02109-3912

Thank you in advance for your attention to these matter. Please be aware that EPA reserves the right to take any further enforcement action regarding these or any other federal environmental violations committed by POSCO.

If you have any questions concerning this NON or your obligations under EPCRA Section 313 or under Section 112(r) of the Clean Air Act, please contact Chris Rascher at (617) 918-1834.

Sincerely,



Susan Studlien, Director  
Office of Environmental Stewardship

cc: Chris Rascher, EPA Region I

